



305 Madison Avenue
New York, NY 10165
T: 212-922-1080
F: 212-949-8255

Isabelle A. Kirshner
Partner
kirshner@clayro.com

February 11, 2021

Hon. Sandra Feuerstein
United States Courthouse
100 Federal Plaza
Central Islip, NY 11722
BY ECF

Re: United States v. Khaimov
20 Crim 267 (267)

Dear Judge Feuerstein:

We are the attorneys for Arkadiy Khaimov, the above-named defendant. Mr. Khaimov pleaded guilty on August 12, 2020 and is scheduled to be sentenced on March 10, 2021. I am writing to request an adjournment of the sentencing proceeding.

As I am sure your honor is aware, Mr. Khaimov was arrested on December 21, 2020 and is now charged in an indictment, US v. Khaimov, 20 Crim. 580 (AMD), which is pending before Judge Donnelly. He is currently detained at the M.D.C.

The new matter has been designated as a complex matter and we anticipate voluminous discovery, none of which has been provided. Obviously, the new indictment presents complicated sentencing issues that need to be addressed. We do not know what Mr. Khaimov's exposure is on the new matter or the impact on the plea before your honor.

We are, therefore, requesting time to try to resolve the new case and evaluate its impact on the matter before you. Therefore, we are respectfully requesting that sentencing in the above entitled matter be adjourned until sometime in July 2021. Bradley King, the assigned AUSA has no objection to this request.

Thank you for your attention to this matter.

Very truly yours,
/s/
ISABELLE A. KIRSHNER

cc: Bradley King, Esq.